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DENTSPLY SIRONA INC.,
DENTSPLY IH INC. and JOSH MCNUTT

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AHMAD FAROOQI,
Plaintiff,
vs.
DENTSPLY SIRONA INC, a D
Corporation, DENTSPLY IH II
Corporation; JOSH MCNUTT,
and DOES 1 through 50, inclus
Defendant.

Case No: 2:20-cv-02363-TLN-JDP

**JOINT STIPULATION AND ORDER TO
AMEND SCHEDULING ORDER RE:
DISCOVERY DEADLINES**

Complaint Filed: September 21, 2020
Removal Filed: November 25, 2020

1 IT IS HEREBY STIPULATED AND AGREED, between the Parties through their counsel of
2 record as follows:

3 WHEREAS, on November 25, 2020, the Court entered an Initial Pretrial Scheduling Order (Dkt.
4) which provided, in relevant part, “All discovery, with the exception of expert discovery, shall be
5 completed no later than two hundred forty (240) days from the date upon which the last answer may be
6 filed with the Court pursuant to the Federal Rules of Civil Procedure. In this context, “completed” means
7 that all discovery shall have been conducted so that all depositions have been taken and any disputes
8 relative to discovery shall have been resolved by appropriate order if necessary, and where discovery
9 has been ordered, the order has been obeyed. All motions to compel discovery must be noticed on the
10 magistrate judge’s calendar in accordance with the Local Rules.”

11 WHEREAS, the last answer was filed on March 4, 2021 by individual defendant Josh McNutt.
12 Therefore, the deadline to complete discovery is currently November 1, 2021.

13 WHEREAS, the parties have exchanged written discovery and have identified five initial
14 deponents. However, the parties are still in the process of scheduling those depositions on mutually
15 agreeable dates for both counsel and the deponents.

16 WHEREAS, while working amicably towards completing depositions prior to the November 1,
17 2021 discovery cutoff, have determined that it will not be possible to do so and that an extension of the
18 discovery deadline will be beneficial to both Plaintiff and Defendants.

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1 THEREFORE, good cause having been shown, the parties stipulate and respectfully request that
2 the Court amend its scheduling order and set the discovery deadline, with the exception of expert
3 discovery, to May 1, 2022. The Parties will track the Court's instructions and timeline in the Initial
4 Pretrial Scheduling Order for completing all discovery of expert witnesses and dispositive motions.

5 IT IS SO STIPULATED.

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7 Dated: September 20, 2021

FISHER & PHILLIPS LLP

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9 By: /s/ Gregory L. Blueford

10 ALDEN J. PARKER
GREGORY L. BLUEFORD

11 Attorneys for Defendants
12 DENTSPLY SIRONA INC.,
DENTSPLY IH INC. and JOSH MCNUTT

13
14 Dated: September 20, 2021

WEBBER LAW GROUP, P.C.

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16 By: /s/ Kelsey A. Webber

[as authorized on 9/20/21]

17 KELSEY A. WEBBER

18 Attorneys for Plaintiff
19 AHMAD FAROOQI

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ORDER

Having reviewed the Parties Joint Stipulation and GOOD CAUSE APPEARING THEREFROM, the Court hereby orders as follows:

- 1. The Parties' Stipulation is GRANTED**

2. Discovery deadlines are as follows:

- (a) Fact Discovery Cut-off: April 29, 2022;

- (b) Expert Disclosure: July 1, 2022;

- (c) Supplemental/Rebuttal Expert Disclosure: September 2, 2022;

3. Expert Discovery Cut-off: The Parties will follow the Court's instruction in the Initial Scheduling Order to complete all discovery of expert witnesses in a timely manner to comply with the Court's deadline for filing dispositive motions.

4. Last Day to File Dispositive Motions: October 26, 2022.

IT IS SO ORDERED.

Dated: September 21, 2021

Troy L. Nunley

Troy L. Nunley
United States District Judge